

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESALE PRICE LITIGATION

MDL No. 1456

THIS DOCUMENT RELATES TO:

ALL ACTIONS

CIVIL ACTION: 01-CV-12257-PBS

Judge Patti B. Saris

**THE J&J DEFENDANTS' AMENDED INDIVIDUAL
DISCLOSURES PURSUANT TO FED R. CIV. P. 26(a)(3)(A)**

I. TRIAL WITNESSES CALLED LIVE

A. Experts

The J&J Defendants reserve the right to call any witnesses identified by Plaintiffs
or the Track 1 Joint Defendants.

NAME AND ADDRESS	WILL TESTIFY	MAY TESTIFY
Jayson S. Dukes FTI Consulting, Inc. One Atlantic Center 1201 West Peachtree Street Suite 500 Atlanta, Georgia 30309 (404) 460-6221	X	
Janusz A. Ordover Department of Economics New York University 269 Mercer Street New York, New York 10003 (212) 998-8956		X

B. Other Witnesses

The J&J Defendants reserve the right to call any witnesses identified by Plaintiffs or the Track 1 Joint Defendants.

NAME AND ADDRESS	WILL TESTIFY	MAY TESTIFY
Cathy Dooley Johnson & Johnson 1350 I Street, N.W. Suite 1210 Washington, D.C. 20005-3305 (202) 589-1000		X
Thomas Hiriak Ortho Biotech Products, L.P. 430 Route 22 East Bridgewater, NJ 08807-0914 (908) 541-4000		X
John Hoffman Centocor, Inc. 800/850 Ridgeview Drive Horsham, PA 19044 (610) 651-6000		X
Julie McHugh Centocor, Inc. 800/850 Ridgeview Drive Horsham, PA 19044 (610) 651-6000	X	
William Pearson Ortho Biotech Products, L.P.	X	

430 Route 22 East Bridgewater, NJ 08807-0914 (908) 541-4000		
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II. EXHIBITS

The J&J Defendants reserve the right to introduce any exhibits or portions thereof identified by Plaintiffs or the Track 1 Joint Defendants. The J&J Defendants also designate all data produced by each of the Plaintiffs which is being relied on by the J&J Defendants' experts or the Track 1 Joint Defendants' experts.

Ex. No.	Beginning Bates Range:	End Bates Range:	Date	Description	Objections
2750	Exh. 1 to the Declaration of Thomas C. Hiriak in Support of the Johnson & Johnson Defendants' Motion for Summary Judgment as to Class 1 and Class 2 ("Hiriak Decl.")		6/29/93	Hiriak Decl. 1: Western Union Mailgram from Dennis Cleary to Retail Pharmacist concerning pharmacy rebate program:	
2751			1994	Hiriak Decl. Ex. 1: Promotion flyer "New Rebate Program in Effect Through June 30, 1994"	
2752			1994	Hiriak Decl. Ex. 1: Promotion flyer "Valuable Rebate Offered Through December 1994"	
2753			5/2/94	Hiriak Decl. Ex. 1: Invoice # 000141094 for	

Ex. No.	Beginning Bates Range:	End Bates Range:	Date	Description	Objections
				rebate to pharmacist	
2754			6/27/94	Hiriak Decl. Ex. 1: Stat/Gram concerning pharmacy rebate program	
2755			1998	Bindley Western Drug Co. Wholesale Price Catalog	
2756			11/29/93	Hiriak Decl. Ex. 3: Letter to physician enclosing rebate	
2757			3/22/94	Hiriak Decl. Ex. 3: Stat/Gram concerning physician rebate program	
2758			1993	Hiriak Decl. Ex. 3: Promotion flyer "Order PROCrit and Continue to Receive an 8% Rebate"	
2759			1994	Hiriak Decl. Ex. 3: Stat/Gram "Save on Procrit with our new rebate program"	
2760				Hiriak Decl. Ex. 5: Procrit and Epogen AWP and Effective Dates	
2761	MDL-OBI00063700	MDL-OBI00063702	10/9/00	Hiriak Decl. Ex. 6: Document re U.S. Oncology's negative assessment of Procrit's reimbursement position	
2762	Exh. 5 to the Declaration of Andrew D. Schau in Support of the Johnson & Johnson Defendants' Motion for Summary Judgment as to		9/21/01	Excerpts from testimony of Zachary T. Bentley, Ven-A-Care; "Medicare Drug Reimbursements: A Broken System for Patients and Taxpayers," Joint Hearing Before the Subcommittee on Health et al., September 21,	

Ex. No.	Beginning Bates Range:	End Bates Range:	Date	Description	Objections
	Class 1 and Class 2			2001, Serial No. 107-65	
2763	MDL-OBI00002588	MDL-OBI00002595	1/1/01	Rebate Agreement w/ Keystone Mercy	
2764	MDL-OBI00030404	MDL-OBI00030412	12/1/01	Rebate Agreement w/ El Dorado Hematology Medical Oncology	
2765	MDL-OBI00031940	MDL-OBI00031948	4/1/01	Rebate Agreement w/ Internal Medicine Associates	
2766	MDL-OBI00017307	MDL-OBI00017307	Undated	Procrit PEP Experience Program	
2767	MDL-OBI00042743	MDL-OBI00042743	11/20/01	Memorandum to Nephrology Field Sales concerning "Competitive Position"	
2768	MDL-OBI00012152	MDL-OBI00012199	Undated	Key Selling Points – Objections and Responses	
2769	MDL-OBI00006540	MDL-OBI00006571	Undated	Strategic Customer Group Workshop	
2770	MDL-OBI00008396	MDL-OBI00008423	5/7/02	Strategic Customer Group Update, Oncology and Critical Care Managers' Meeting	
2771	MDL-OBI00041918	MDL-OBI00041976	5/7/02	Strategic Customer Group Update, Oncology and Critical Care Franchisees Managers' Meeting	
2772	MDL-OBI00040740	MDL-OBI00040772	4/16/03	"A Reimbursement Review" by Becky Hayes and Jeanette Dominguez	

Ex. No.	Beginning Bates Range:	End Bates Range:	Date	Description	Objections
2773	MDL-OBI00040966	MDL-OBI00040969	Undated	"Least Costly Alternative Q/A"	
2774	MDL-OBI00043351	MDL-OBI00043383	5/5/02	Email, with attachments, dated from Mark Reese to Bill Pearson (et al.) re "Medicare/Medicaid Updates and Strategies"	
2775	MDL-OBI00007368	MDL-OBI00007375	Undated	"Option Paper on AWP Reform"	
2776	MDL-OBI00050429	MDL-OBI00050429	Undated	"AWP Reform – Talking Points"	
2777	MDL-OBI00050431	MDL-OBI00050431	Undated	"AWP Reform – Johnson & Johnson Principles"	
2778	MDL-OBI00050432	MDL-OBI00050433	Undated	"Alternatives to AWP– Pros & Cons"	
2779	MDL-OBI00002838	MDL-OBI00002965	5/15/02	Memo from J Dempsey re "Wholesaler manipulation of AWP"	
2780	MDL-OBI00007628	MDL-OBI00007629	12/7/00	Correspondence re Peter Stark	
2781			12/13/05	Plaintiffs' Supplemental Response to J&J Defendants' Requests for Admission and Interrogatories Concerning Procrit.	
2782			12/12/05	Plaintiffs' Supplemental Response to J&J Defendants' Requests for Admission and Interrogatories Concerning Remicade.	
2783			2/1/06	Complaint in <i>District Counsel 37 Health & Security Plan et al. v. McKesson Corp</i> , C 4:06-cv-00718-SBA (N.D.	

Ex. No.	Beginning Bates Range:	End Bates Range:	Date	Description	Objections
				Cal.)	
2784			5/8/06	Declaration of Jayson S. Dukes (“Dukes Decl.”) in Support of the Johnson & Johnson Defendants Motion for Summary Judgment as to Class 1 and Class 1 [Corrected]	
2784-A			Undated	Dukes Decl. Attachment 1: Curriculum Vitae of Jayson S. Dukes	
2784-B			Undated	Dukes Decl. Attachment 2: Statement of Assumptions	
2784-C			Undated	Dukes Decl. Attachment 3: Information Considered	
2784-D			Undated	Dukes Decl. Exhibit 1: Listings of specific transactions excluded from calculations* (Previously provided to Plaintiff electronically)	
2784-E			Undated	Dukes Decl. Exhibit 2: Listings of specific transactions excluded from calculations* (Previously provided to Plaintiff electronically)	
2784-F			12/15/05	Dukes Decl. Exhibit 3: Dr. Hartman’s calculations of the Procrit and Remicade ASPs, attachment G.4.a*	
2784-G			12/15/05	Dukes Decl. Exhibit 4: Dr. Hartman’s calculations of the Procrit and Remicade spreads, attachment G.4.c*	

Ex. No.	Beginning Bates Range:	End Bates Range:	Date	Description	Objections
2784-H			5/8/06	Dukes Decl. Exhibit 5: FTI Calculations of Procrit's ASPs by NDC and by year*	
2784-I			5/8/06	Dukes Decl. Exhibit 6: FTI Calculations of Procrit's Spreads by NDC and by year*	
2784-J			5/8/06	Dukes Decl. Exhibit 7a: Comparison of Procrit ASPs to Dr. Hartman Declaration dated 12/15/05*	
2784-K			5/8/06	Dukes Decl. Exhibit 7b: Comparison of Procrit ASPs to Dr. Hartman Declaration dated 12/15/05*	
2784-L			5/8/06	Dukes Decl. Exhibit 7c: Comparison of Remicade ASPs to Dr. Hartman Declaration dated 12/15/05*	
2784-M			5/8/06	Dukes Decl. Exhibit 7d: Comparison of Remicade ASPs to Dr. Hartman Declaration dated 12/15/05*	
2784-N			5/8/06	Dukes Decl. Exhibit 8: Annual ASP Calculations from Dr. Hartman Declaration dated 2/3/06*	
2784-O			5/8/06	Dukes Decl. Exhibit 9: Annual Spread Calculations from Dr. Hartman Declaration dated 2/3/06*	
2784-P			5/8/06	Dukes Decl. Exhibit 10: FTI Comparison of ASP Calculations - Dr. Hartman Declaration dated 2/3/06*	

Ex. No.	Beginning Bates Range:	End Bates Range:	Date	Description	Objections
2784-Q			5/8/06	Dukes Decl. Exhibit 11: FTI Comparison of Spread Calculations - Dr. Hartman Declaration dated 2/3/06*	
2784-R			5/8/06	Dukes Decl. Exhibit 12a: Comparison of Procrit ASP Calculations to Dr. Hartman Declaration dated 2/3/06*	
2784-S			5/8/06	Dukes Decl. Exhibit 12b: Comparison of Procrit ASP Calculations to Dr. Hartman Declaration dated 2/3/06*	
2784-T			5/8/06	Dukes Decl. Exhibit 12c: Comparison of Remicade ASP Calculations to Dr. Hartman Declaration dated 2/3/06*	
2784-U			5/8/06	Dukes Decl. Exhibit 12d: Comparison of Remicade ASP Calculations to Dr. Hartman Declaration dated 2/3/06*	
2784-V			5/8/06	Dukes Decl. Exhibit 13: Comparison of Procrit Indirect Sales Excluded Units to Dr. Hartman Declaration dated 2/3/06*	
2784-W			5/8/06	Dukes Decl. Exhibit 14: Procrit Government Transactions FTI Excludes and Dr. Hartman Includes*	

Ex. No.	Beginning Bates Range:	End Bates Range:	Date	Description	Objections
2784-X			5/8/06	Dukes Decl. Exhibit 15: Remicade Government Transactions FTI Excludes and Dr. Hartman Includes*	
2784-Y			5/8/06	Dukes Decl. Exhibit 16: Price Distribution of Procrit Units Sold by Class of Trade*	
2784-Z			5/8/06	Dukes Decl. Exhibit 17: Procrit Spread Calculations Greater Than 30% from Dr. Hartman's Declaration dated 12/15/05*	
2784-AA			5/8/06	Dukes Decl. Exhibit 18: Procrit Spread Calculations Greater Than 30% from Dr. Hartman's Declaration dated 2/3/06*	
2784-BB			5/8/06	Dukes Decl. Exhibit 19: Schedule of transactions omitted from calculations; Centocor represents to be data entry errors* (Previously provided to Plaintiff electronically)	
2784-CC			5/8/06	Dukes Decl. Exhibit 20: Schedule of Transactions excluded from calculations re effects of service fees and discounts* (Previously provided to Plaintiff electronically)	
2784-DD			5/8/06	Dukes Decl. Exhibit 21: Schedule of transactions excluded from calculations re discount fees from Nova Factor	

Ex. No.	Beginning Bates Range:	End Bates Range:	Date	Description	Objections
				and Priority Healthcare* (Previously provided to Plaintiff electronically)	
2784-EE			5/8/06	Dukes Decl. Exhibit 22: Schedule of transactions excluded from calculations re sales orders placed prior to price increase* (Previously provided to Plaintiff electronically)	
2784-FF			5/8/06	Dukes Decl. Exhibits 23 and 24: Schedule of transactions excluded from calculations re units where sale price was 0\$ for Procrit and Remicade* (Previously provided to Plaintiff electronically)	
2785	MDL-CEN000103691	MDL-CEN000103691		Remicade_Livingston Invoices.txt	
2786	MDL-HCS00013636	MDL-HCS00013636		Daf_Data.mdb	
2787	MDL-HCS00275969	MDL-HCS00275969		PSGA Data 12-15-2004.mdb	
2788	MDL-HCS00275971	MDL-HCS00275971		Daf_Data_2003_01_30_2005.mdb	
2789	MDL-OBI00056539	MDL-OBI00056539		PROCRIT_.mdb PROCRIT1.XLS	
2790	MDL-CEN00108048	MDL-CEN00108048		Chargebacks 2003 for awp.xls	
2791	MDL-HCS00013630	MDL-HCS00013630		IMHC_1991.mdb IMHC_1992.mdb IMHC_1993.mdb IMHC_JAN_TO_JUN_1994.mdb IMHC_JAN_TO_JUN_1	

Ex. No.	Beginning Bates Range:	End Bates Range:	Date	Description	Objections
				995.mdb IMHC_JAN_TO_JUN_1 996.mdb IMHC_JAN_TO_JUN_1 997.mdb IMHC_JAN_TO_JUN_1 998.mdb IMHC_JAN_TO_JUN_1 999.mdb IMHC_JUL_TO_DEC_ 1994.mdb CARS_REBATES_FIN AL.mdb	
2792	MDL- HCS00013631	MDL- HCS00013631		IMHC_JUL_TO_DEC_ 1995.mdb IMHC_JUL_TO_DEC_ 1996.mdb IMHC_JUL_TO_DEC_ 1997.mdb IMHC_JUL_TO_DEC_ 1998.mdb	
2793	MDL- HCS00013632	MDL- HCS00013632		OBI_CBK_99_00_02.m db OBI_CBK_2001.mdb	
2794	MDL- HCS00013634	MDL- HCS00013634		REMICADE CONTRACT DATABASE.mdb	
2795	MDL- HCS00275988	MDL- HCS00275988		OBI_CBK_2003.mdb	
2796	MDL- HCS00282702	MDL- HCS00282702		IMHC_MISSING_2_D AYS_SEND_11112004. xls Supplemental_Cbks_Pro cDt2004_to_20050511_ 2003- before_invoice.mdb	

Ex. No.	Beginning Bates Range:	End Bates Range:	Date	Description	Objections
2797	MDL-HCS00283267	MDL-HCS00283267		OBI_CBK_2002.mdb	
2798	FTI 00001	FTI 00001		AWP Litigation CB_CustomerList.xls* CB_Cust_FewOthers.xls* CB_unique_cust_Additional.xls* Remicade_CustomerList.xls* Remicade_CustomerList_Nulls.xls* tbl_CB_unique_cust_New.txt*	
2799	MDL-CEN00108050	MDL-CEN00108050		Rebates by process date w customer name 1-1-01 thru 12-31-03.xls	
2800	MDL-HCS00283269	MDL-HCS00283269		CARSIS_MANAGEDCARE_NEW_11092004_FINAL.mdb	
2801	FTI 000035	FTI 000035		2006_2_23_Wholesaler Pricing Point.xls	
2802	MDL-CEN00000026	MDL-CEN00000026	6/13/01	Letter re 3.9% price increase for Remicade	
2803	MDL-CEN00000737	MDL-CEN00000737	7/9/02	Letter to Health Net re Amendment to Rebate Agreement	
2804	MDL-CEN00000738	MDL-CEN00000741	1/1/02	Amendment to Health Net Care Systems Rebate Agreement	
2805	MDL-CEN00000882	MDL-CEN00000908	7/1/02	Product Pricing Agreement between HealthPartners, Inc and Health Care Systems Inc.	
2806	MDL-CEN00004003	MDL-CEN00004008	11/18/98	Memo from McDermott re Additional Information on AWP Spread	

Ex. No.	Beginning Bates Range:	End Bates Range:	Date	Description	Objections
2807	MDL-CEN00004027	MDL-CEN00004038	6/18/99	Fax from FirstDataBank to Mike Ziskin, Centocor re New Product Submission form	
2808	MDL-CEN00007528	MDL-CEN00007552	11/27/01	Centocor Commercial Contracting Strategy	
2809	MDL-CEN00013965	MDL-CEN00013965	6/13/01	Letter from Ron Krawczyk to First Data Bank re 3.9% increase to Remicade list price	
2810	MDL-CEN00013968	MDL-CEN00013968	6/13/01	Letter from Ron Krawczyk to CliniDATA re 3.9% increase to Remicade list price	
2811	MDL-CEN00013969	MDL-CEN00013969	6/13/01	Letter from Ron Krawczyk to Red Book re 3.9% increase to Remicade list price	
2812	MDL-CEN00014002	MDL-CEN00014002	6/13/01	Letter from Ron Krawczyk to Cardinal Health Inc. re 3.9% increase to Remicade list price	
2813	MDL-CEN00014004	MDL-CEN00014004	6/13/01	Letter from Ron Krawczyk to AmeriSource Corp. re 3.9% increase to Remicade list price	
2814	MDL-CEN00014008	MDL-CEN00014008	6/13/01	Letter from Ron Krawczyk to McKesson HBOC, Inc. re 3.9% increase to Remicade list price	
2815	MDL-CEN00014235	MDL-CEN00014235	11/3/00	Letter from Ron Krawczyk to Fisrt Data Bank re 3.8% increase to Remicade list price	
2816	MDL-CEN00014253	MDL-CEN00014253	2/24/00	Memo from Scodari re Remicade 2000 Price Increase	
2817	MDL-CEN00014254	MDL-CEN00014254	Undated	Centocor, Inc. Price Increase History	

Ex. No.	Beginning Bates Range:	End Bates Range:	Date	Description	Objections
2818	MDL-CEN00014322	MDL-CEN00014328	8/22/02	Immunology Business Unit 2003 Business Plan, Executive Summary	
2819	MDL-CEN00014768	MDL-CEN00014790	July, 1999	Remicade Office Based Infusion Guide	
2820	MDL-CEN00024776	MDL-CEN00024790	Undated	Practice Building Opportunities	
2821	MDL-CEN00028906	MDL-CEN00028972	Undated	Remicade Corporate Accounts 2002 Business Plan	
2822	MDL-CEN00030466	MDL-CEN00030467	3/16/98	Memo from Carpenter re Average Acquisition Price vs. Average Acquisition Price with attached 3/13/98 memo re same	
2823	MDL-CEN00044499	MDL-CEN00044504	6/6/01	E-mail from Rick Bierly attaching t. Vernon Remicade Price Increase memo	
2824	MDL-CEN00044764	MDL-CEN00044754	3/23/00	Draft letters re 4.9% Price Increase for Remicade effective 3/23/00	
2825	MDL-CEN00054756	MDL-CEN00054893	1/5/98	Interviews: Presented by NCI Managed Care	
2826	MDL-CEN00064895	MDL-CEN00065029	5/15/97	cA2 Commercialization Strategy Plan	
2827	MDL-CEN00069786	MDL-CEN00069838	5/21/02	E-mail from Michael Ziskind attaching 5/8/02 Infusion Therapy Costs in Physicians' Offices report	
2828	MDL-CEN00085479	MDL-CEN00085524	4/18/02	HCC Training Presented to RBS	
2829	MDL-CEN00091734	MDL-CEN00091958	Undated	Remicade Site of Care (SOC) Training Program	
2830	MDL-CEN00092122	MDL-CEN00092197	12/14/00	Presentation: Health Care Compliance (HCC)	
2831	MDL-CEN00093041	MDL-CEN00093151	7/28/00	Remicade: Practice management Program Goal for PMP	

Ex. No.	Beginning Bates Range:	End Bates Range:	Date	Description	Objections
2832	MDL-CEN00094118	MDL-CEN00094135	5/21/02	May, 2001 Pricing Update	
2833	MDL-CEN00098193	MDL-CEN00098198	11/18/99	Centocor's Health Care Compliance Project, Fraud and Abuse, Presentation to Management Board	
2834	MDL-CEN000103407	MDL-CEN000103447	Undated	Centocor Practice Management Tools Coding, Coverage, and Reimbursement	
2835	MDL-CEN000104171	MDL-CEN000104176	6/7/02	RBS Scenario Role Play Talk Track	
2836	MDL-CEN000106858	MDL-CEN000106903	Sept. 1997	Strategic Marketing Corp. A Qualitative Assessment of Third Party Payors' Acceptance of CenTNF, a Monoclonal Antibody (MAB) for the Treatment of Crohn's Disease, Interim Report	
2837			3/14/96	Memo from Mooney to Duxbury re: expense report	
2838			10/18/96	Memo from Wood to Duxbury re: expense report errors	
2839			11/27/96	Memo from Wood to Duxbury re: Verbal Warning for work performance	
2840			12/3/96	Duxbury Performance review	
2841			3/24/97	Memo from Wood to Duxbury re: performance	
2842			4/6/98	Memo from Woodhouse to Duxbury re: late reporting of	

Ex. No.	Beginning Bates Range:	End Bates Range:	Date	Description	Objections
				administrative responsibilities	
2843			4/23/98	Memo from Woodhouse to Duxbury re: performance	
2844			5/02/98	Memo from Ashe to Duxbury re: Verbal Warning for performance	
2845			6/18/98	Memo from Woodhouse to Duxbury re: Performance Evaluation and Written Warning	
2846			7/20/98	Memo from Duxbury to Woodhouse re: Resignation	
2847			8/10/98	Letter from Duxbury to unknown party (<i>believed to be State of Washington Employment Security Department</i>) re: working conditions and validity of Amgen's suit against Ortho Biotech	
2848			9/18/98	State of Washington Employment Security's Denial of Duxbury's claim for benefits	
2849			10/19/98	Duxbury's Notice of Appeal with attached letter from Duxbury	
2850			7/16/01	Summons and Complaint filed by Duxbury against Ortho Biotech re: wrongful discharge and breach of	

Ex. No.	Beginning Bates Range:	End Bates Range:	Date	Description	Objections
				contract	
2851			3/21/03	Order Granting Summary Judgment for Ortho Biotech in Duxbury v. Ortho Biotech	
2852			5/3/04	Court of Appeal for the State of Washington decision affirming Summary Judgment in Duxbury v. Ortho Biotech	
2853			7/12/05	Government's Notice of Election to Decline Intervention in Duxbury's <i>qui tam</i> proceeding against Ortho Biotech	
2854			7/12/05	Order from the District Court unsealing the complaint in Duxbury's <i>qui tam</i> proceeding against Ortho Biotech and ordering Duxbury to serve the complaint on Ortho Biotech	
2855			4/28/06	Declaration of Mark E. Duxbury	
2856			9/15/06	Relator's Emergency Motion Requesting a Temporary Stay of the Court's 7-12/-5 Order	
2857	MDL-JAN00180843	MDL-JAN00180844	6/12/02	E-mail from Mike Borgia re AWP Change with First Data Bank	

Ex. No.	Beginning Bates Range:	End Bates Range:	Date	Description	Objections
2858	MDL-JAN00114976	MDL-JAN00114976	5/15/02	E-mail from William Parks re Price Alert Change to our AWP	
2859	MDL-CEN00005508	MDL-CEN00005510	2/21/02	E-mail from Michael Ziskind re AWP Pricing – Per my voicemail	
2860	MDL-JAN00006938	MDL-JAN00006940	7/16/02	E-mail from William Parks re Price Alert Change to our AWP	
2861	MDL-JJ00000168	MDL-JJ00000171	9/27/02	E-mail from Alex Gorsky re AWP Reporting Issue: an overview	
2862	MDL-CEN00002717	MDL-CEN00002878	3/25/98	cA2 Marketing Plan U.S. Crohn's Indication Launch	
2863			5/8/06	"The Pink Sheet" re ASP Calculation Rankles IG; Drugs to Face Dropping Reimbursement Rates?	
2864	MDL-CEN00103705	MDL-CEN00103710	8/20/02	Legislative Update Representative Greenwood	
2865			April 1986	Congressional Budget Office Physician Reimbursement Under Medicare: Options for Change	
2866			Undated	Ortho Oncology Sales Franchise Sales Training Process	

* The J&J Defendants' Trial Exhs. 2784-D to 2875-FF and 2798 are admissible pursuant to FED. R. EVID. 1006, this material shall be deemed admissible. The data and information underlying these exhibits have been produced to plaintiffs' counsel.

Dated: October 23, 2006

/s/ William F. Cavanaugh, Jr.

William F. Cavanaugh, Jr.

Andrew D. Schau

Erik Haas

Adeel A. Mangi

Mark Young

Niraj J. Parekh

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(212) 336-2000

CERTIFICATE OF SERVICE BY LEXISNEXIS FILE & SERVE

Docket No. MDL 1456

I, Mark G. Young, hereby certify that I am one of the J&J Defendants' attorneys and that, on October 23, 2006, I caused copies of **THE J&J DEFENDANTS' AMENDED INDIVIDUAL DISCLOSURES PURSUANT TO FED R. CIV. P. 26(a)(3)(A)** to be served on all counsel of record by causing same to be posted electronically via Lexis-Nexis File & Serve.

/s/ Mark G. Young